

In para 3 of NPRM 05-235 there are three basic reasons for the NPRM.

1. Encourage individuals to become amateurs...

This currently exists in the Technician class license. It is known that these numbers are down despite the elimination of the code requirement.

2. Unnecessary requirement...

This may be true if the applicant desires not to operate on frequencies designated as part of a band plan. So therefore, only require knowledge of what modes you will plan on using as part of your operating privileges and be tested "certified" on use of those modes.

If you must drop the Morse requirement, then I strongly recommend renaming the class of license you have and grandfather the current classes as you have done with Novice and Advanced. In other words,

create a new class of HF license. The entry level class of license

used to be the Novice who had access to HF CW privileges. Today it is

the Technician class. This class has all the modes of operation plus more bandwidth than the entire HF spectrum. The main incentive for upgrading in the past has been frequency privileges on HF. This has proven to help only a few upgrade who wanted to operate all of the available HF spectrum. If the intent is to promote incentive licensing, then permission to operate more modes should be the incentive. The higher the class of license, the more modes of operation and bandwidth available.

3. Promote more efficient use of HF spectrum. This is not relevant.

CW operation is one of the most efficient modes and a requirement to show proficiency has nothing to do with the use of spectrum. This area of discussion is more relevant to band plan use and should be reserved for that NPRM.